



Puente Hills Landfill
Native Habitat Preservation Authority

October 22, 2009

Martha Crusius, Project Manager
National Park Service
San Gabriel Special Resource Study
Park Planning and Environmental Compliance
1111 Jackson Street, Suite 700
Oakland, CA 94607
Via email PWR_sangabriel@nps.gov

Comments on Preliminary Alternative Concepts for the
San Gabriel Watershed and Mountains Study Area

Dear Ms. Crusius:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the preliminary alternative concepts of the San Gabriel Watershed and Mountains Special Resource Study.

The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. The mission of the Habitat Authority is to acquire, restore, and manage open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency will endeavor to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority's jurisdiction extends within eastern Los Angeles County approximately from the intersection of the 605 and 60 Freeways in the west to Harbor Boulevard in the east. The Habitat Authority manages and/or owns a 3,869 acre Preserve in the Puente Hills.

Responses to questions on your comment form are below.

***Is there one alternative concept or idea presented that you think is most valuable in terms of improving recreational opportunities and protecting significant resources?
Tell us why you think this idea is valuable.***



A variation of Alternative C is the most valuable in terms of improving recreational opportunities and protecting significant resources. This variation would also include the Puente Hills as a part of a national recreation area (NRA). This idea is valuable because it adds a federal layer of protection to the significant natural resources identified in the Study Area and provides for their management when there is not a management entity in place.

What suggestions do you have for strengthening or improving on the alternative concepts? Do you have an entirely different vision of how the area should be managed? If so please describe your vision.

The Habitat Authority supports an alternative that includes the Puente Hills and federally recognizes the significance of its natural resources. It would not affect local land use controls and would not take local government control away. Furthermore, the Habitat Authority supports an alternative that recognizes and provides protection for public investments in public infrastructure in service today. It would bring prestige and recognition to the area, most likely increasing tourism and positively impacting the local economy. The National Park Service affiliation would help raise awareness of these resources in people's backyards and the importance of preserving them, resulting in increased respect and sensitivity for their intrinsic value. This expanded NRA that includes the Puente Hills would create opportunities for partnerships with NPS that currently do not exist such as with interpretation or technical assistance.

Furthermore, the Habitat Authority supports the Rivers and Mountains Conservancy's proposed alternative in their staff report dated September 21, 2009 an illustration of which is attached hereto. This alternative designates the entire Study Area as a NRA.

As stated in the aforementioned RMC staff report the proposed NRA, "... would first and foremost mandate consistency with local land use, water conservation, flood control and water quality mandates as may currently exist and are updated in the future. This would include appropriate provisions for landfills (there are currently two active landfills in the area), discharge facilities for reclaimed water, the flood control infrastructure, water conservation, water storage and others. This NRA option would also allow for the National Park Service to own and manage property which ultimately could benefit such Watershed Conservation Authority properties as the Duck Farm and Azusa River Wilderness Park.

"Creating a National Recreation Area at the proposed scale allows for the most flexibility in funding and operations for the National Park Service's (NPS) administration of the Recreation Area. There are agreements allowed under the federal code that allow for funds to flow to projects that are within or adjoining the boundary of a Park Unit/Recreation Area. This would certainly be advantageous to the state and local agencies and non-profits that have on going and future projects in this area.

"The vision of the National Recreation Area would be to expand and protect the interconnected system of parks, habitats, and open spaces, connecting urban neighborhoods, mountains, and rivers within a broader ecosystem. Coordinated education and interpretation focuses on connecting people to the special resources and stories of their mountains and watershed. Access to recreational opportunities closer to home is increase and enhanced.

"Including the Angeles National Forest and the Puente Hills recognizes the special character of the San Gabriel Mountains and the associated foothills and hills in our region as a collection of nationally significant resources, a habitat connector, and an urban recreation area. Public awareness and appreciation of the mountains will be elevated through the increased and improved recreation, education and access.

"There are several National Recreation Areas that operate in urban settings across the country that inform us of the successes and issues in this type of endeavor, in our region. Within these recreation areas land is owned and operated by a wide variety of entities and individuals for diverse and divergent purposes. With the exemptions already identified in place in the legislation this would not change within the envisioned Recreation Area.

"The RMC, WCA, USFS, Cities and other agencies and organizations with land and interests in the area would continue to manage their own land. Specifically, the upper watershed would continue to be operated by the USFS. In the lower portion of the watershed the operation and maintenance would continue with the existing owners. The members of this partnership would work through the partnership to develop and implement a comprehensive management strategy for the watershed's natural and cultural resources, public access and recreation opportunities, as well as interpretive and educational opportunities. The partnership would also develop a voluntary program throughout the rest of the watershed that would allow existing conservation and recreation-oriented sites to offer coordinated interpretation and information. Water and flood protections would continue to be managed by those currently responsible.

"An information sharing network led by NPS would be established to organize, consolidate, and distribute scientific information related to the region. An urban satellite office connected to the California Mediterranean Research Learning Center at Santa Monica Mountains National Recreation Area would provide research and educational opportunities to communities, universities, colleges and schools. Serving as a research facility as well as information dissemination point, this partnership would serve as a model for future efforts in other areas."

What concerns do you have about the concepts?

The Habitat Authority is concerned that nationally significant resources in the Puente Hills will not be protected unless they receive a federal designation providing such. These last remaining resources are surrounded by approximately one half of the state's population. It

is situated in an area well-known to be a global hotspot for biodiversity. Their protection should be the responsibility of a combination of local, state and federal entities.

What are your thoughts or comments on the study findings (significance, suitability or feasibility)?

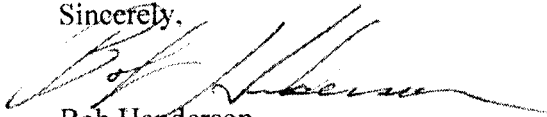
The Habitat Authority agrees with and supports the preliminary findings from the study. In terms of significance, the San Gabriel Mountains and the Puente -Chino Hills represent important examples of the native Southern California landscape. The San Gabriel Mountains are significant for geologic resources, and biodiversity, dynamic river systems, and a long history of scientific study and discovery. The Puente -Chino Hills are significant for rare native plant communities, including coastal sage scrub and walnut woodlands.

In terms of suitability, the two areas contain a combination of themes and resources not found in any national park unit or comparably managed area.

In terms of feasibility, the nationally significant portions could be additions to the national park system when collaborated with existing land managers to protect natural and cultural resources, provide recreation, public access, and interpretation and educational opportunities. In addition technical and administrative assistance for conservation and recreational planning is a feasible role for NPS.

Thank you for your consideration of these comments, and please include us on the mailing list regarding future updates of this planning process.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Bob Henderson', is written over a horizontal line.

Bob Henderson
Chair

EXHIBIT B

San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy Alternative for the San Gabriel Watershed and Mountains Special Resource Study

